

| UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY | |
|--|--|
| Caption in Compliance with D.N.J. LBR 9004-1(b) | |
| GENOVA BURNS LLC Daniel M. Stolz, Esq. Donald W. Clarke, Esq. Gregory S. Kinoian, Esq. dstolz@genovaburns.com dclarke@genovaburns.com gkinoian@genovaburns.com 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Tel: (973) 467-2700 Fax: (973) 467-8126 <i>Proposed Local Counsel to the Official Committee of Talc Claimants</i> | BROWN RUDNICK LLP David J. Molton, Esq. Robert J. Stark, Esq. Michael S. Winograd, Esq. Eric R. Goodman, Esq. dmolton@brownrudnick.com rstark@brownrudnick.com mwinograd@brownrudnick.com egoodman@brownrudnick.com Seven Times Square New York, NY 10036 Tel: (212) 209-4800 Fax: (212) 209-4801 and Jeffrey L. Jonas, Esq. Sunni P. Beville, Esq. jjonas@brownrudnick.com sbeville@brownrudnick.com One Financial Center Boston, MA 02111 Tel: (617) 856-8200 Fax: (617) 856-8201 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i> |
| MASSEY & GAIL LLP Jonathan S. Massey, Esq. jmassey@masseygail.com 1000 Maine Ave. SW, Suite 450 Washington, DC 20024 Tel: (202) 652-4511 Fax: (312) 379-0467 <i>Proposed Special Counsel for the Official Committee of Talc Claimants</i> | OTTERBOURG PC Melanie L. Cyganowski, Esq. Adam C. Silverstein, Esq. Jennifer S. Feeney, Esq. mcyganowski@otterbourg.com asilverstein@otterbourg.com jfeeney@otterbourg.com 230 Park Avenue New York, NY 10169 Tel: (212) 905-3628 Fax: (212) 682-6104 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i> |

| | |
|--|---|
| In Re: LTL MANAGEMENT, LLC, Debtor. | Chapter 11 Case No.: 23-12825 (MBK) Honorable Michael B. Kaplan |
|--|---|

**NOTICE OF MOTION TO SEAL THE REDACTED PORTIONS OF THE
OFFICIAL COMMITTEE OF TALC CLAIMANTS' OBJECTION
TO DEBTOR'S MOTION FOR AN ORDER APPOINTING RANDI S.
ELLIS AS LEGAL REPRESENTATIVE FOR FUTURE TALC CLAIMANTS**

PLEASE TAKE NOTICE that the Official Committee of Talc Claimants (the “**TCC**” or the “Committee”) in the above-captioned case of LTL Management, LLC (the “Debtor” or “**LTL**”), by and through its proposed counsel, will move before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the United States Bankruptcy Court for the District of New Jersey, Trenton Vicinage, at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8, pursuant to 11 U.S.C. § 107(b), Fed. R. Bankr. P. 9018 and D.N.J. LBR 9018-1 (the “**Motion to Seal**”) for entry of an order, substantially in the form submitted herewith, (A) for authority to file under seal the redacted portions of the *Official Committee of Talc Claimants' Objection to Debtor's Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants* (the “**Objection**”), filed substantially contemporaneously herewith,¹ in response to the *Debtor's Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants* (the “**FCR Appointment Motion**”) [Docket No. 87], and (B) granting the Committee such other and further

¹ A redacted version of the Objection has been filed immediately prior to the filing of this Motion to Seal. An unredacted version of the Objection is being filed immediately after the filing of this Motion to Seal in accordance with this Court's procedures for electronically requesting that a document be sealed (*see* Process to Electronically Request that a Document be Sealed | United States Bankruptcy Court - District of New Jersey (uscourts.gov)).

relief as the Court deems necessary, appropriate and consistent with the goals of the Motion to Seal.

PLEASE TAKE FURTHER NOTICE that, substantially contemporaneously with the filing of the Motion to Seal, the Committee has also filed an *Application for Order Shortening Time and Certain Other Relief* (the “**Scheduling Application**”) requesting that the hearing on the Motion to Seal be scheduled contemporaneously with the Debtor’s FCR Appointment Motion, which is currently scheduled to be heard on May 3, 2023 at 10:00 a.m.

PLEASE TAKE FURTHER NOTICE that objections, if any must be filed with the Clerk of the United States Bankruptcy Court, 50 Walnut Street, 3rd Floor, Courtroom 3A, Newark, New Jersey 07102, and served upon Genova Burns, LLC, Attn: Donald W. Clarke, Esq., 110 Allen Road, Ste. 304, Basking Ridge, New Jersey so they are received in accordance with the Court’s order entered with respect to the Scheduling Application.

PLEASE TAKE FURTHER NOTICE that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Dated: April 26, 2023

GENOVA BURNS LLC

By: /s/ Gregory S. Kinoian

Daniel M. Stolz, Esq.

Donald W. Clarke, Esq.

Gregory S. Kinoian, Esq.

110 Allen Rd., Suite 304

Basking Ridge, NJ 07920

Tel: (973) 467-2700

Fax: (973) 467-8126

Email: DStolz@genovaburns.com

DClarke@genovaburns.com

GKinoian@genovaburns.com

*Proposed Local Counsel for the Official
Committee of Talc Claimants*